

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

168 th and DODGE, L.P. (f/k/a BROWN)	
INVESTMENT PARTNERSHIP, LTD.) and)	
RED DEVELOPMENT OF WEST DODGE, LLC,)	
)	
Plaintiffs,)	
)	Civil Action No. 05-MC-10293-RGS
vs.)	
)	
RAVE REVIEWS CINEMAS, LLC,)	
)	
Defendant.)	

**DEFENDANT RAVE REVIEWS CINEMAS, LLC'S
MOTION FOR EXTENSION OF TIME
TO RESPOND TO PLAINTIFFS' MOTION TO COMPEL**

COMES NOW defendant Rave Reviews Cinemas, LLC ("Rave"), by and through the undersigned counsel, and moves this Court for an extension of time, up to and including August 26, 2005, in which to file its response to Plaintiffs' Motion to Compel (ECF Doc #1). In support of its motion, Rave respectfully states as follows:

1. On August 8, 2005, plaintiffs filed their motion, which seeks to compel third-party Boston Ventures Management, Inc., to produce certain documents requested per subpoena issued on July 12, 2004, and concerning the deposition of Boston Ventures' corporate representative, taken on June 30, 2005. Responses to plaintiffs' Motion are currently due on August 19, 2005.

2. Rave requests this extension due to the press of business in other matters, and because defendant's lead counsel is expected to be out of the office for much of the time until the current deadline.

3. Further, to the extent that plaintiffs claim that counsel for plaintiffs conferred with counsel for defendant Rave prior to the filing of their Motion to Compel and concerning the issues raised therein, Rave denies that any such communication was initiated or occurred prior to the filing of plaintiffs' instant motion.

4. No prior extensions have been requested by or granted to Rave with respect to this motion.

5. The requested extension of time is not made for the purpose of delay, and will not prejudice the interest of any party to this case. Counsel for Rave sought the consent of counsel for plaintiffs regarding this request for extension, but did not receive a response.

WHEREFORE, Rave Reviews Cinemas, LLC, requests an extension of time, up to and including August 26, 2005, in which to file its response to Plaintiffs' Motion to Compel, and for such other and further relief as the court deems just and proper.

Respectfully submitted,

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ATTORNEY FOR DEFENDANT
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CERTIFICATE OF SERVICE

I hereby certify that the above and foregoing was served via United States mail, first-class postage prepaid, on August 15, 2005, addressed to the following counsel of record:

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